

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

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In the Matter of	)	
	)	
Lifeline and Link Up Reform and	)	WC Docket No. 11-42
Modernization	)	
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Lifeline and Link Up	)	WC Docket No. 03-109
_____	)	

**REPLY COMMENTS OF REUNION COMMUNICATIONS, INC.**

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May 10, 2011

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## TABLE OF CONTENTS

	Page
I. INTRODUCTION AND SUMMARY .....	1
II. COMMENTERS PROVIDING REASONED ANALYSES OF THE TLS REIMBURSEMENT ISSUE SUPPORT CONTINUED TLS REIMBURSEMENT FOR WIRELINE ETCS .....	3
III. COMMENTERS SUPPORTING ELIMINATION OF TLS REIMBURSEMENT FAIL TO PROVIDE ANY REASONED ANALYSIS OR DATA SUPPORTING THEIR POSITIONS .....	7
IV. SOME COMMENTERS RECOGNIZE THE IMPORTANCE OF NO-DEPOSIT SERVICE OFFERS FOR LOW-INCOME CONSUMERS BUT FAIL TO APPRECIATE THE LINKAGE BETWEEN TLS REIMBURSEMENT AND SUCH OFFERS .....	10
V. CONCLUSION.....	12

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**REPLY COMMENTS OF REUNION COMMUNICATIONS, INC.**

Reunion Communications, Inc. (“Reunion Communications”), by and through its attorneys, submits these reply comments in response to initial comments filed by various parties on April 21, 2011, pursuant to the Federal Communications Commission’s (“FCC” or “Commission”) March 2, 2011 Notice of Proposed Rulemaking<sup>1</sup> in the above-captioned proceedings.

**I. INTRODUCTION AND SUMMARY**

Reunion Communications asserted in its initial Comments, and other commenters agreed, that the provision of toll limitation services (“TLS”) to Lifeline subscribers and TLS reimbursement remain essential to achieving the Commission’s goal of maximizing opportunities for low-income consumers to stay connected to the network, emergency services and job

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<sup>1</sup> *In re: Lifeline and Link Up Reform and Modernization; Federal-State Joint Board on Universal Service; Lifeline and Link Up*, Notice of Proposed Rulemaking, FCC 11-32 (rel. Mar. 4, 2011) (“Lifeline NPRM”).

opportunities. TLS enables low-income consumers to stay connected to the network by enabling them to control toll charges and to avoid deposit requirements which would otherwise serve as a substantial barrier to subscribership. TLS reimbursement enables wireline competitive Eligible Telecommunications Carriers (“ETCs”) to provide compelling “no-deposit” bundled service packages to low-income consumers featuring a full month of unlimited local and inbound calling, plus a pre-set amount of toll calling.

The Commission previously recognized the importance of, and the need for, TLS and TLS reimbursement. Neither the Commission nor any commenter (including each commenter that supported the Commission’s proposal to eliminate TLS reimbursement) relies on any specific evidence to support the supposition that TLS is no longer essential.

To the contrary, Reunion Communications submitted evidence demonstrating that TLS and TLS reimbursement remains essential to achieving the core goal of the low-income fund: maximizing subscribership levels. This evidence showed that low-income consumers do not enjoy copious amounts of “any distance” calling and that their long distance rates remain relatively high when compared to the rates enjoyed by more affluent consumers. Many carriers – individually and through two separate industry associations – agreed that TLS reimbursement remains necessary for maximizing opportunities to keep low income consumers connected to the network. Commenters agreed with Reunion Communications that elimination of TLS reimbursement will make unsustainable the pre-paid, no-deposit wireline competitive ETC business model that now serves hundreds of thousands of low-income consumers.

Without TLS reimbursement, low-income consumers would face deposit requirements, higher rates and a reduced number and level of service offerings. Any of these consequences will result in decreased subscribership levels among low-income consumers.

Indeed, consumer advocates recognized that deposit requirements will drive down low-income consumer subscribership levels and one state commission called for Commission guidance on how to regulate such deposit amounts. Such a decrease in subscribership levels would be antithetical to the Commission's stated goal of increasing subscribership levels for low-income consumers.<sup>2</sup> Reunion Communications suggests, and other commenters agree, that, if the Commission determines it is necessary to address waste, fraud and abuse with respect to TLS reimbursement in other than an adjudicatory/enforcement setting, the Commission should adopt its alternative proposal of setting a reasonable cap on TLS reimbursement amounts.

**II. COMMENTERS PROVIDING REASONED ANALYSES OF THE TLS REIMBURSEMENT ISSUE SUPPORT CONTINUED TLS REIMBURSEMENT FOR WIRELINE ETCs**

The record contains ample and well-reasoned agreement with Reunion Communications' position that TLS is still essential to Lifeline subscribers and that the Commission should continue to provide TLS reimbursements to wireline ETCs. Industry associations COMPTel and NALA/PCA – representing the interests of dozens of carriers – both argued against the Commission's proposal to eliminate TLS reimbursement.<sup>3</sup> Like Reunion Communications, COMPTel argued that the Commission failed to offer sufficient justification for eliminating the TLS reimbursement rule and asserted that TLS remains essential for the same reasons the Commission recognized it was essential back in 1997.<sup>4</sup> COMPTel also cited high TLS take-rates as a measure of the program's success in increasing subscribership levels and

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<sup>2</sup> See, e.g., *In re: Federal-State Joint Board on Universal Service*, 12 FCC Rcd 8776, ¶ 329 (1997).

<sup>3</sup> Comments of COMPTel at 11-12 (filed April 21, 2011) ("COMPTel Comments"); Initial Comments of NALA/PCA to the Notice of Proposed Rulemaking ("NPRM") on Lifeline and Link Up Reform and Modernization at 5 (filed April 21, 2011) ("NALA/PCA Comments").

<sup>4</sup> COMPTel Comments at 12.

warned that, in the absence of TLS reimbursement, deposit requirements would drive down low-income consumer subscribership levels.<sup>5</sup>

Similarly, NALA/PCA, which represents numerous wireline competitive ETCs, asserted that TLS remains an essential tool that maximizes opportunities for low-income consumers to stay connected to the network.<sup>6</sup> NALA/PCA also underscored the value proposition offered by wireline competitive ETC pre-paid bundled service offerings and affirmed that their current service offerings would be uneconomic without TLS reimbursement.<sup>7</sup> Separately, a group of wireline competitive ETCs filed a letter with the Commission in support of Reunion Communications' positions in this proceeding and underscoring many of the factual assertions made by Reunion Communications in its initial comments.<sup>8</sup> As Reunion Communications demonstrated in its initial comments and ex parte submissions, low-income consumers deserve the benefits of competition and should not be relegated to having to choose only among incumbent LEC ETC and wireless ETC offerings.<sup>9</sup>

Amvensys, a Lifeline service provider, averred that TLS support "is not outdated" and remains "vital."<sup>10</sup> Like Reunion Communications, Amvensys recognized that without

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<sup>5</sup> See *Id.* at 12.

<sup>6</sup> See NALA/PCA Comments at 5.

<sup>7</sup> See *Id.* at 5.

<sup>8</sup> See Letter from Jim Dry, Image Access, Inc. d/b/a New Phone, *et al.* to Marlene H. Dortch, FCC (filed May 10, 2011) A copy of this letter is appended hereto as Exhibit A.

<sup>9</sup> Comments of Reunion Communications, Inc. at 5, 15-19 (filed April 21, 2011) ("Reunion Communications Comments") and Exhibit A, Decl. of M. Widbin, ¶ 6. NASUCA also noted the importance of competition for the Lifeline subscriber: "Competition is good for customers...a company with a business plan to promote Lifeline may do a better job than a company that perceives Lifeline only from the viewpoint that it is a statutory obligation to provide service." Comments of the National Association of State Utility Consumer Advocates on Notice of Proposed Rulemaking at 28 (filed April 21, 2011) ("NASUCA Comments").

<sup>10</sup> Comments of Amvensys Telecom Holdings at 6 (filed April 21, 2011) ("Amvensys Comments").

reimbursement, TLS would not likely be offered for free, Lifeline subscribers would be unlikely to pay for it, and Lifeline customers would face deposit requirements.<sup>11</sup> This, of course, would drive down low-income consumer subscribership levels.

The Consumer Groups took no position on the proposed elimination of TLS reimbursement, but acknowledged the relationship between TLS and deposits and affirmed that deposit requirements will deter or prevent low-income consumers from subscribing to basic phone service.<sup>12</sup> A dozen Lifeline subscriber customers of Chicago-based wireline competitive ETC SOS Telecom, Inc. signed letters affirming the importance of TLS and explaining the difficulties that would ensue if carriers were forced to demand deposits or raise rates in the wake of the Commission's proposed changes to the TLS reimbursement rule.<sup>13</sup> As the Commission previously has recognized, and as Reunion Communications' initial comments confirm, few if any subscribers will take TLS if they have to pay for it.<sup>14</sup>

Critically, COMPTTEL and Amvensys echoed Reunion Communications' recommendation that the Commission's concerns with perceived waste, fraud and abuse could be addressed rationally through adoption of a TLS reimbursement cap, rather than through elimination of TLS reimbursement altogether.<sup>15</sup> AT&T also expressed support for adoption of a TLS reimbursement cap.<sup>16</sup> Although AT&T suggested a \$1/month per subscriber cap, AT&T

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<sup>11</sup> *Id.* at 6-7.

<sup>12</sup> Comments of Advocates for Basic Legal Equality, Inc., *et al.* at 13 (filed April 21, 2011) ("Consumer Groups Comments").

<sup>13</sup> *See, e.g.*, Letter from David Peterson to Chairman Julius Genachowski, FCC (filed May 10, 2011). Copies of these letters are appended hereto as Exhibit B.

<sup>14</sup> Reunion Communications Comments at 12; Decl. of M. Widbin, ¶ 8.

<sup>15</sup> COMPTTEL Comments at 12-13; Amvensys Comments at 6. *See, also*, Reunion Communications Comments at 16-17.

<sup>16</sup> *See* Comments of AT&T at 3 (filed April 21, 2011) ("AT&T Comments").

recognized that some ETCs may have higher incremental costs.<sup>17</sup> Any competitive ETC that purchases TLS from AT&T has higher incremental costs.<sup>18</sup> Therefore, Reunion Communications respectfully submits that any cap be set at a more reasonable rate reflective of current marketplace conditions. The recurring and non-recurring rate cap levels proposed by Reunion Communications in its initial comments reasonably approximate current marketplace conditions and are supported by NALA/PCA and its many wireline competitive ETC members.<sup>19</sup>

Reunion Communications also opposes AT&T's documentation and approval proposal for above-cap reimbursement requests.<sup>20</sup> While Reunion Communications does not oppose a requirement that competitive ETCs be required to produce supporting documentation for above-cap reimbursement requests (or for increases in below-cap reimbursement request amounts), Reunion Communications opposes AT&T's suggestion that Commission approval be required for each such request.<sup>21</sup> Instead, the Commission should use the information collected to investigate and potentially to take enforcement action against any specific ETC whose reimbursement request and supporting documentation raise doubts as to reasonableness and justification. AT&T's approach would needlessly waste Commission resources by forcing the Commission to investigate and approve every above-cap reimbursement request. Moreover, it would unreasonably inject unmanageable uncertainty into the businesses of AT&T's wireline ETC competitors. The best regulatory approach is not to burden all regulatees for the

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<sup>17</sup> See *Id.* at 31.

<sup>18</sup> See Reunion Communications Comments at 11 (*citing* CGM, LLC Study of AT&T Retail Rates); Decl. of M. Widbin, ¶ 4.

<sup>19</sup> Reunion Communications understands that NALA/PCA intends to file reply comments on May 10, 2011 endorsing Reunion Communications' proposed TLS reimbursement caps.

<sup>20</sup> See AT&T Comments at 31.

<sup>21</sup> See *Id.* at 31.

transgressions of a few – or to favor one group of competitors by placing additional burdens on another group of competitors.

**III. COMMENTERS SUPPORTING ELIMINATION OF TLS REIMBURSEMENT  
FAIL TO PROVIDE ANY REASONED ANALYSIS OR DATA SUPPORTING  
THEIR POSITIONS**

Several commenters did no more than “vote” in favor of the Commission’s proposal to eliminate TLS reimbursement.<sup>22</sup> Some of these commenters simply embraced the Commission’s conjecture about the continuing usefulness of TLS and some simply accepted the Commission’s proposal as a means (acceptable to them) of cutting fund costs. Significantly, *none* of these commenters supplied any reasoned analysis or data to support their position in favor of the Commission’s proposed elimination of TLS reimbursement.

Other commenters such as CenturyLink and US Telecom offered qualified support for the Commission’s proposed elimination of TLS reimbursement, seeking to ensure that it remains (as proposed) coupled with the elimination of any requirement to provide TLS free-of-charge.<sup>23</sup> However, like the “voters”, these commenters also failed to supply any reasoned analysis or data to support their position in favor of the Commission’s proposed elimination of TLS reimbursement.

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<sup>22</sup> See, e.g., Comments of Comcast Corporation at 2 (filed April 21, 2011) (“Comcast Comments”); Comments of the Michigan Public Service Commission at 4 (filed April 21, 2011) (MI PSC Comments”); Comments of the Public Service Commission of Missouri at 6 (filed April (filed April 20, 2011) (“MO PSC Comments”); Comments Submitted on Behalf of the Staff of the Public Utilities Commission of Ohio at 8 (filed April 21, 2011) (“PUCO Comments”); Comments of Sprint Nextel Corporation at 9 (filed April 21, 2011) (Sprint Comments”); Comments of Verizon and Verizon Wireless at n.14 (filed April 21, 2011) (Verizon/Verizon Wireless Comments”).

<sup>23</sup> See, e.g., Comments of CenturyLink at 8 (filed April 21, 2011) (“CenturyLink Comments”); Comments of the United States Telecom Association at 16 (filed April 21, 2011) (“US Telecom Comments”). See also, AT&T Comments at 31 (not objecting to the Commission’s proposal).

Joining this block of voters, TracFone recently filed an *ex parte* presentation supporting elimination of TLS reimbursement based on its view that TLS is "irrelevant" because consumers have access to "all distance" service plans.<sup>24</sup> TracFone provided no data to support its position that TLS has become irrelevant. Nor could it. As Reunion Communications explained in its initial comments, low-income consumers typically do not enjoy unrestricted access to "any distance" calling plans or low long distance calling rates.<sup>25</sup> For example, wireless ETCs such as TracFone typically provide limited usage packages with included minutes ranging from 68-250 minutes per month, or a mere 2 to 8 minutes per day (with both in-bound and out-bound minutes counting against these limits).<sup>26</sup> Additional minutes typically are available only in large chunks at high price points reflecting relatively high rates. Once again, using TracFone as an example, additional minutes are offered in large chunks for premium prices (TracFone presently offers 100 minutes for \$20 (i.e., \$0.20/minute, with 100 minute minimum)).<sup>27</sup> Thus, TracFone's wireless ETC offering provides a stark contrast to the unlimited in-bound and unlimited local calling included in wireline competitive ETC service plans (additional long distance minutes typically are sold in 100 minute bundles for \$10).<sup>28</sup> Many low-income consumers choose TracFone and other wireless ETC alternatives. However, many do not.

Indeed, competitive concerns may be at the core of TracFone's position.

Receiving no TLS reimbursement, TracFone clearly has no problem eliminating support that its wireline ETC competitors get. According to CGM, LLC, a consultancy based in Atlanta used by

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<sup>24</sup> See Letter from Mitchell F. Brecher, GreenbergTraurig, Counsel to TracFone Wireless, Inc. to Secretary Marlene Dortch, FCC (dated May 4, 2011) at 10.

<sup>25</sup> Reunion Communications Comments at 5; Decl. of M. Widbin, ¶ 14.

<sup>26</sup> See Reunion Communications Comments at 9-10; Decl. of M. Widbin, ¶ 16.

<sup>27</sup> Reunion Communications Comments at 10; Decl. of M. Widbin, ¶ 16.

<sup>28</sup> Reunion Communications Comments at 9; Decl. of M. Widbin, ¶ 14.

many competitive ETCs, wireline competitive ETCs had 363,592 lines as of February 2011 (March 2011 USAC data on February 2011 lines) or about 7% of the wireline total and 3% of the overall count.<sup>29</sup> In certain states, the wireline competitive ETC Lifeline subscriber counts and shares are substantial. In Louisiana, wireline competitive ETCs have 88,585 lines and a 78% share of the wireline Lifeline lines in that state.<sup>30</sup> Indeed, wireline competitive ETCs played a huge role in driving-up subscribership in that state post-Hurricane Katrina. In Oklahoma, wireline competitive ETCs cater to native American low-income consumers and now have 99,122 lines and a 56% share of the wireline lifeline market.<sup>31</sup> Other jurisdictions where wireline competitive ETCs are making a real difference include Alabama (27,815 lines, 37% share), the District of Columbia (1,637 lines, 25% share), Illinois (10,081 lines, 14% share), Michigan (8,628 lines, 11% share), Mississippi (15,244 lines, 27% share), North Carolina (21,783 lines, 18% share), South Carolina (14,236 lines, 25% share), and Tennessee (9,277 lines, 12% share).<sup>32</sup>

At bottom, those commenters voting in support of the proposed elimination of TLS reimbursement offered no reasonable basis or data to support the Commission's proposed

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<sup>29</sup> See CGM, LLC, Study of Lifeline Market Shares, April 2011 (March 2011 USAC data) ("CGM Lifeline Market Study"). Reunion Communications' initial comments included a chart comparing the attributes of wireline competitive ETC, wireline incumbent ETC and wireless competitive ETC service offerings. Reunion Communications Comments at Exhibit A. Notably, 70 of 83 respondents in a recent "pilot study" in Massachusetts rated the ability to make and receive calls at home at the highest level of importance. The same number of respondents rated voice as the most important communications service. See "The Phoneless in the Broadband Age", Carolyn Gideon, Assistant Professor of International Communication and Technology Policy, FCC Ex Parte Presentation, WC Dkt. No. 11-42 (April 8, 2011). These survey results suggest that a significant number of low-income consumers may continue to choose wireline ETC service offerings over mobile wireless alternatives.

<sup>30</sup> CGM Lifeline Market Study.

<sup>31</sup> *Id.*

<sup>32</sup> *Id.*

reversal of its long-held finding that TLS and TLS reimbursement are essential to achieving the goals of the low-income fund.

**IV. SOME COMMENTERS RECOGNIZE THE IMPORTANCE OF NO-DEPOSIT SERVICE OFFERS FOR LOW-INCOME CONSUMERS BUT FAIL TO APPRECIATE THE LINKAGE BETWEEN TLS REIMBURSEMENT AND SUCH OFFERS**

Commenters representing consumer interests offered seemingly conflicting or at least internally inconsistent positions regarding TLS reimbursement. NASUCA argued that no-deposit Lifeline services are “absolutely essential for the continued availability of Lifeline for millions of existing low income customers.”<sup>33</sup> However, NASUCA also agreed with the Commission’s proposal to eliminate TLS reimbursement, arguing that ETCs should be required to provide Lifeline services without deposits.<sup>34</sup> Similarly, the Consumer Groups warned that deposit requirements will drive down subscribership levels.<sup>35</sup> Yet, the Consumer Groups took no position on the proposed elimination of TLS reimbursement – even though they acknowledged the relationship between TLS and deposits, noting that ETCs may not require deposits if the Lifeline customer takes TLS.<sup>36</sup> Notably, the Commission’s proposed rule changes include elimination of the rule barring the collection of deposits from Lifeline customers who take TLS.<sup>37</sup>

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<sup>33</sup> NASUCA Comments at 11.

<sup>34</sup> *Id.* at 11.

<sup>35</sup> *See* Consumer Groups Comments at 13 (acknowledging the Commission’s Lifeline deposit rule to support its assertion that up-front fees deter participation in Lifeline).

<sup>36</sup> *Id.* at 13.

<sup>37</sup> *See Lifeline NPRM*, Appendix A (proposing elimination of rule 54.401(c)). Currently rule 54.401(c) states as follows: “Eligible telecommunications carriers may not collect a service deposit in order to initiate Lifeline service, if the qualifying low-income consumer voluntarily elects toll limitation service from the carrier, where available. If toll

Both NASUCA and the Consumer Groups failed to comprehend the linkage between TLS reimbursement and Lifeline subscriber deposit requirements. TLS reimbursement is what drives take-rates for TLS which in turn makes no-deposit service offers possible.<sup>38</sup> As Reunion Communications demonstrated in its initial comments, consumers are typically unwilling to pay for TLS.<sup>39</sup> TLS reimbursement makes “free” TLS available (often on an integrated basis in bundled service offerings).<sup>40</sup> Without TLS reimbursement, wireline competitive ETCs will be unable to support such service offerings.<sup>41</sup> As Reunion Communications demonstrated in its initial comments, the incremental costs of providing TLS are too large to absorb or to pass-on.<sup>42</sup> Moreover, if TLS reimbursement is eliminated and subscribership levels recede, a tremendous amount of Link Up investment will be stranded.

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limitation services are unavailable, the carrier may charge a service deposit.” 47 C.F.R. § 54.401(c).

<sup>38</sup> Reunion Communications Comments at 8-9; Decl. of M. Widbin, ¶¶ 11-12.

<sup>39</sup> Reunion Communications Comments at 15; Decl. of M. Widbin, ¶ 8.

<sup>40</sup> Reunion Communications Comments at 13; Decl. of M. Widbin, ¶ 11.

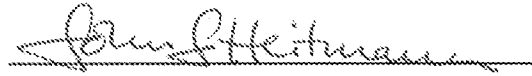
<sup>41</sup> Reunion Communications Comments at 15; Decl. of M. Widbin, ¶ 9.

<sup>42</sup> Reunion Communications Comments at 15; Decl. of M. Widbin, ¶ 9. NASUCA’s comments regarding the costs of TLS apparently focus on those ETCs that self-provision TLS and not on the incremental costs incurred by ETCs who must purchase TLS from third party vendors. *See* NASUCA Comments at 11.

V. CONCLUSION

For the foregoing reasons, Reunion Communications urges the Commission not to adopt its proposal to eliminate TLS reimbursement. If the Commission is compelled to take action to curb waste, fraud and abuse with respect to TLS reimbursement outside of case-by-case enforcement, adoption of a reasonable cap for TLS reimbursement is a better means of controlling waste, fraud and abuse while maximizing the opportunities for low-income consumers to stay connected to the network, emergency services and employment opportunities.

Respectfully Submitted:



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*Counsel for Reunion Communications, Inc.*

# **EXHIBIT A**

May 10, 2011

Via ECFS

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: *In re: Lifeline and Link Up Reform and Modernization; Federal-State  
Joint Board on Universal Service; Lifeline and Link Up; WC Docket No.  
11-42, CC Docket No. 96-45, WC Docket No. 03-109*

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Dear Secretary Dortch:

We the undersigned executives of wireline competitive eligible telecommunications carriers (“ETCs”)<sup>1</sup> write to express for the record our opposition to the Federal Communications Commission’s (“Commission”) proposal to eliminate TLS reimbursement and our support for the positions taken by Reunion Communications in its comments, including its alternative proposal of adopting a reasonable cap on TLS reimbursement. While we fully support the Commission’s goal of eliminating waste, fraud and abuse in the Lifeline fund, we believe that the approach endorsed by Reunion Communications represents a more well tailored regulatory solution that will effectively address the problem while continuing to maximize opportunities for low-income consumers to stay connected to the network, emergency services and job opportunities.

As explained by Reunion Communications, TLS and TLS reimbursement are critical elements to wireline competitive ETC business model and the compelling value proposition it brings to the low-income consumer. Our companies succeed in this space by offering better customer care, education and value than our competition. We speak different languages, we interface with local social service agencies and we set ourselves up to provide the “high touch” customer care that is required. We also provide a product that bundles a full month of always-on inbound and outbound local calling with a limited allotment of toll calling (using TLS). And we do this at a price that is manageable for many low-income consumers. While the service packages vary from carrier-to-carrier and from state-to-state, in general, we agree with Reunion Communications that the so-called sweet spot for this market segment is \$20-22 per month (after application of Lifeline funding).

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<sup>1</sup> Some of the signatories this letter also are wireless competitive ETCs serving Lifeline customers. These wireless offerings are best seen as alternatives to and not as replacements for wireline competitive ETC offerings. Some low-income consumers prefer the value and features of the wireline offering over those of wireless offerings, including free wireless calling packages.

Many of our customers seem to prefer the high reliability of our non-mobile, always-on wireline services which feature unlimited local calling and limited toll. All of our customers take TLS because it is integrated into our bundled service offerings. Without TLS reimbursement, it would not be possible for us to offer these high value service packages. We all purchase TLS from a wholesale provider. Whether it be toll blocking from the incumbent LECs or toll control solutions from a vendor like Reunion Communications, we incur costs from these vendors which simply cannot be absorbed by us (our margins are too thin) and cannot be passed on to our customers (their ability to pay is very limited).

Accordingly, the elimination of TLS reimbursement would have a devastating effect on our business and on our customers. Our customers would be forced to move to alternatives they view as inferior – some with higher costs and no inbound calling and others with severely restricted usage limits applicable to inbound and outbound calling. Our businesses would need to respond by abandoning current wireline offerings and by eliminating the jobs that support them. It is no exaggeration to state that hundreds of jobs supported by the wireline competitive ETC business model will be put at risk.

For all of the reasons set forth by Reunion Communications in its comments, we respectfully urge the Commission to adopt a reasonable cap for TLS reimbursement. This approach should effectively control “bad actors” while allowing “good actors” to continue to serve low-income consumers with compelling wireline service packages.

Respectfully Submitted,

/s/ Brent Ragin

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/s/ Thomas Armstrong

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1020 N. 9<sup>th</sup> Avenue  
Pensacola, FL 32501

# **EXHIBIT B**

May 4, 2011

Chairman Julius Genachowski  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Chairman Genachowski:

I am subscriber to the Lifeline program, through SOS Telecom, Park Ridge, Illinois.

The purpose of this letter is to tell you that the ability to limit my long distance service to the number of minutes that I have agreed to purchase is very helpful to me. I signed up for a Lifeline package that includes 100 minutes of long distance calling each month. In the Chicago area, that means that all calls more than 15 miles away are considered long distance.

The service that SOS Telecom provides to me includes a voice announcement of my minutes remaining. This tells me two important things:


1. When I make a call that I otherwise wouldn't know is local or long distance, the announcement of minutes available allows me to decide "is this call important enough to use some of my long distance minutes to make this call?", and
2. How many minutes out of the 100 that I buy each month are still available to use?

Because I have several people who live in my household, and visitors are often in my household, it is important to me to avoid large bills that would be beyond my ability to pay. This would result in me having to discontinue my phone service, try to pay a deposit, or purchasing long distance calling cards—none of which are good options for me.

SOS Telecom tells me that there is a Government procedure underway now that, if implemented, would cause me to have to provide a large deposit or pass a credit check, or result in my telephone bill going up about \$6.00 per month. None of these choices would serve me well, and I hope that you will consider people like me as you decide this matter. My budget is already strained—Lifeline is a real help, and I can't afford to see a price increase.

Sincerely,

(Signature)

 (David Peterson)

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City, State, ZIP

Chicago, IL 60612

Phone Number

312-733-9175

May 4, 2011

Chairman Julius Genachowski  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Chairman Genachowski:

I am subscriber to the Lifeline program, through SOS Telecom, Park Ridge, Illinois.

The purpose of this letter is to tell you that the ability to limit my long distance service to the number of minutes that I have agreed to purchase is very helpful to me. I signed up for a Lifeline package that includes 100 minutes of long distance calling each month. In the Chicago area, that means that all calls more than 15 miles away are considered long distance.

The service that SOS Telecom provides to me includes a voice announcement of my minutes remaining. This tells me two important things:

1. When I make a call that I otherwise wouldn't know is local or long distance, the announcement of minutes available allows me to decide "is this call important enough to use some of my long distance minutes to make this call?", and
2. How many minutes out of the 100 that I buy each month are still available to use?

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SOS Telecom tells me that there is a Government procedure underway now that, if implemented, would cause me to have to provide a large deposit or pass a credit check, or result in my telephone bill going up about \$6.00 per month. None of these choices would serve me well, and I hope that you will consider people like me as you decide this matter. My budget is already strained—Lifeline is a real help, and I can't afford to see a price increase.

Sincerely,

(Signature)

Hattie Cole (Hattie Cole)

Street Address

2045 W. Jackson, Apt 611

City, State, ZIP

Chicago, IL 60612

Phone Number

312-243-7897

May 4, 2011

Chairman Julius Genachowski  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Chairman Genachowski:

I am subscriber to the Lifeline program, through SOS Telecom, Park Ridge, Illinois.

The purpose of this letter is to tell you that the ability to limit my long distance service to the number of minutes that I have agreed to purchase is very helpful to me. I signed up for a Lifeline package that includes 100 minutes of long distance calling each month. In the Chicago area, that means that all calls more than 15 miles away are considered long distance.

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Sincerely,

(Signature) Belinda Gamble (Belinda Gamble)

Street Address 3033 W Walnut

City, State, ZIP Chicago Illinois

Phone Number 773 265-8553

May 4, 2011

Chairman Julius Genachowski  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Chairman Genachowski:

I am subscriber to the Lifeline program, through SOS Telecom, Park Ridge, Illinois.

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Sincerely,

(Signature)

Lashunda Sanders (Lashunda Sanders)

Street Address

5065 W. PULASKI

City, State, ZIP

CHICAGO IL 60651

Phone Number

(773) 287-2204

May 4, 2011

Chairman Julius Genachowski  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Chairman Genachowski:

I am subscriber to the Lifeline program, through SOS Telecom, Park Ridge, Illinois.

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Sincerely,

(Signature) Kenny Williams  
Street Address 737 N Central ave, Apt 101  
City, State, ZIP Chicago - IL 60644  
Phone Number 773 287-3574

May 4, 2011

Chairman Julius Genachowski  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Chairman Genachowski:

I am subscriber to the Lifeline program, through SOS Telecom, Park Ridge, Illinois.

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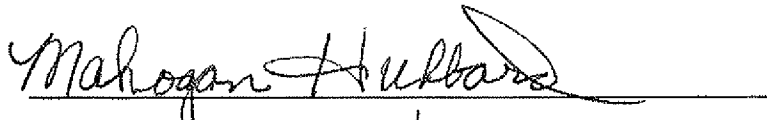
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Sincerely,

(Signature)



Street Address

737 N. Central, Apt 105

City, State, ZIP

Chicago, IL 60644

Phone Number

May 4, 2011

Chairman Julius Genachowski  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Chairman Genachowski:

I am subscriber to the Lifeline program, through SOS Telecom, Park Ridge, Illinois.

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Sincerely,

(Signature)

Luz Maldonado (Luz Maldonado)

Street Address

3304 W. Diversey

City, State, ZIP

Chicago, IL 60641

Phone Number

773-489-4391

May 4, 2011

Chairman Julius Genachowski  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Chairman Genachowski:

I am subscriber to the Lifeline program, through SOS Telecom, Park Ridge, Illinois.

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Sincerely,

(Signature) Lucrécia Gonzalez (Lucrécia Gonzalez)

Street Address 3807. W. Diversey

City, State, ZIP Chicago, IL 60647

Phone Number 773-862-8113

May 4, 2011

Chairman Julius Genachowski  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Chairman Genachowski:

I am subscriber to the Lifeline program, through SOS Telecom, Park Ridge, Illinois.

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Sincerely,

(Signature)

*Charlotte Dennis* (Charlotte Dennis)

Street Address

*3333 N. Kenmore Ave Apt 3.*

City, State, ZIP

*Chicago Ill 60657*

Phone Number

*773-868-0329*

May 5, 2011

Chairman Julius Genachowski  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Chairman Genachowski:

I am subscriber to the Lifeline program, through SOS Telecom, Park Ridge, Illinois.

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Sincerely,

(Signature)

Azalee James (Azalee James)

Street Address

5280 S. Blackstone Ave., (apt. 206)

City, State, ZIP

Chicago, Illinois 60615

Phone Number

(773) 363-8744

May 5, 2011

Chairman Julius Genachowski  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Chairman Genachowski:

I am subscriber to the Lifeline program, through SOS Telecom, Park Ridge, Illinois.

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Sincerely,

(Signature)

Norell Parnell (Norell Parnell)

Street Address

1342 W. 15 St

City, State, ZIP

Chicago, IL, 60608

Phone Number

(312) 733-0279

May 5, 2011

Chairman Julius Genachowski  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Chairman Genachowski:

I am subscriber to the Lifeline program, through SOS Telecom, Park Ridge, Illinois.

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Sincerely,

(Signature)

Gwendolyn Parker

Street Address

1342 W 15th St

City, State, ZIP

Chicago IL 60608

Phone Number

1-312-243-4468